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January 17, 2018

Jennifer D. Hindin
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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Intelsat License LLC, Request for Extension of Closing Deadline,
IB Docket No. 11-205; File Nos. SAT-T/C-20111123-00225,
SAT-T/C-20111123-00226, SES-T/C-20111123-01403, and
SES-T/C-20111206-01427**

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”), by counsel, respectfully requests an additional 180 days—until July 16, 2018—to consummate fully the transfer of control that the Commission previously approved in the above-referenced proceedings.

On May 16, 2012, the International Bureau authorized the transfer of control of the earth station and space station licenses held by Intelsat¹ pursuant to a public offering of newly issued voting shares, subsequent voting share sales by current shareholders, and possible private placements of newly issued voting shares.²

¹ The space station authorization previously held by Intelsat New Dawn Company, Ltd. is now held by Intelsat License LLC. *See Policy Branch Information, Actions Taken*, Report No. SAT-00925, File No. SAT-ASG-20130116-00009 (Jan. 18, 2013).

² *See Intelsat Global Holdings, S.A. Applications to Transfer Control of Intelsat Licenses and Authorizations from BC Partners Holdings Limited to Public Ownership*, IB Docket No. 11-205, Order, 27 FCC Rcd 5226 (rel. May 16, 2012) (“*Intelsat Transfer Application Grant*”). The FCC has previously extended the deadline for transfer of the earth and space station licenses. *See* Letter from Jennifer D. Hindin, Counsel for Intelsat, to Marlene H. Dortch, Federal Communications Commission, IB Docket No. 11-205 (filed Jan. 30, 2014; stamp grant Feb. 18, 2014); Letter from Jennifer D. Hindin, Counsel for Intelsat, to Marlene H. Dortch, Federal Communications Commission, IB Docket No. 11-205 (filed Jul. 29, 2013; stamp grant Aug. 6, 2013); Letter from Jennifer D. Hindin, Counsel for Intelsat, to Marlene H. Dortch, Federal Communications Commission, IB Docket No. 11-205 (filed Jan. 24, 2013; stamp grant Feb. 11, 2013); Letter from Jennifer D. Hindin, Counsel for Intelsat, to Marlene H. Dortch, Federal Communications Commission, IB Docket No. 11-205 (filed Jul. 30, 2012; stamp grant Jul. 31, 2012). Requests to extend the deadline until January 17, 2018 are currently pending. *See* Letter from Jennifer D. Hindin, Counsel for Intelsat, to Marlene H. Dortch, Federal Communications Commission, IB Docket No. 11-205 (filed July 21, 2017); Letter from Jennifer D. Hindin, Counsel for Intelsat, to Marlene H. Dortch, Federal Communications Commission, IB Docket No. 11-205 (filed Jan. 27, 2017); Letter from Jennifer D. Hindin, Counsel for Intelsat, to Marlene H. Dortch, Federal Communications Commission, IB Docket No. 11-205 (filed Jul. 11, 2016); Letter from Jennifer D. Hindin, Counsel



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Intelsat completed a public offering of newly issued voting shares on April 23, 2013. As previously disclosed and as required by the rules of the U.S. Securities and Exchange Commission ("SEC"), on April 1, 2014, Intelsat expanded its board from eight members to nine members with the addition of a new independent director.³ In December of 2016, the composition of the board changed to be comprised of seven members, with two representatives of BC Partners Holdings Limited ("BCP"), two members of management, and three independent directors. We know of no other changed circumstance that would affect the public interest analysis made at the time of the transfer of control grant.

Grant of this request for an additional extension of time will serve the public interest. As a result of these changes to the Intelsat board, BCP no longer has *de facto* control of Intelsat. Intelsat anticipates that the *de jure* portion of the transfer of control will be consummated as current owners reduce their shareholdings through market transactions or secondary offerings. Grant of the requested extension will serve the public interest by permitting Intelsat an opportunity to complete all aspects of the approved transfer of control in a time frame consistent with current business and market considerations.

(Continued . . .)

for Intelsat, to Marlene H. Dortch, Federal Communications Commission, IB Docket No. 11-205 (filed Jan. 6, 2016); Letter from Jennifer D. Hindin, Counsel for Intelsat, to Marlene H. Dortch, Federal Communications Commission, IB Docket No. 11-205 (filed Jul. 22, 2015); Letter from Jennifer D. Hindin, Counsel for Intelsat, to Marlene H. Dortch, Federal Communications Commission, IB Docket No. 11-205 (filed Jan. 29, 2015); Letter from Jennifer D. Hindin, Counsel for Intelsat, to Marlene H. Dortch, Federal Communications Commission, IB Docket No. 11-205 (filed Jul. 30, 2014). Intelsat holds a separately granted authorization to transfer control of the private wireless license with call sign WQSW724, *see* File No. 0006525208. The Wireless Bureau recently granted a request to extend the closing deadline until October 27, 2017 and a request to extend the deadline until April 25, 2018 is currently pending. *See* ULS File Nos. 0007740528 (granted April 25, 2017) and 0007970659 (filed Oct. 24, 2017).

³ *See* Letter from Jennifer D. Hindin, Counsel for Intelsat, to Marlene H. Dortch, Federal Communications Commission, IB Docket No. 11-205 (filed July 30, 2014); *see also* Letter from Jennifer D. Hindin, Counsel for Intelsat, to Marlene H. Dortch, Federal Communications Commission, File No. 0004961083 (filed Apr. 10, 2014).



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Please do not hesitate to contact the undersigned if you have any questions.

Sincerely,

/s/ Jennifer D. Hindin

Jennifer D. Hindin